

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

Mark A. Kirsch
Direct: +1 212.351.2662
Fax: +1 212.351.6362
MKirsch@gibsondunn.com

July 26, 2021

VIA ELECTRONIC FILING

Application DENIED. No party seeks to maintain the letter at Dkt. No. 119 under seal.

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 118 and unseal the letter at Dkt. No. 119.

Dated: July 30, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC et al.*, No. 20-cv-3773 (LGS)

Dear Judge Schofield:

Pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020, Dkt. No. 51 (“Confidentiality Order”) (which incorporates the Court’s Individual Rule I(D)(3)), I write respectfully on behalf of Defendants to request that Defendants’ letter response to Plaintiff’s pre-motion letter seeking to strike the rebuttal report filed by Defendants’ valuation expert, Marc. J. Brown (the “Letter”), be filed under seal.

Defendants’ Letter references the expert reports authored by Plaintiff’s valuation expert, Dr. Antoinette Schoar, that Plaintiff has designated as Confidential Information or Discovery Material, as defined in the Confidentiality Order. Parties and attorneys of record who should have access to the sealed document are listed in Appendix A.

Pursuant to Paragraph I.D.3 of the Court’s Individual Rules, Defendants note that they are not the parties “with an interest in confidential treatment” of information contained in the Letter. Indiv. R. & P. ¶ I.D.3. Absent objection by Plaintiff, Defendants would not oppose filing the Letter on the public docket without redactions.

Respectfully,

/s/ Mark A. Kirsch

Mark A. Kirsch

cc: All counsel of record (via ECF)

GIBSON DUNN

Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

Gibson, Dunn & Crutcher LLP

Randy M. Mastro

Mark A. Kirsch

Avi Weitzman

Casey Kyung-Se Lee

Cleary Gottlieb Steen & Hamilton LLP

Joon H. Kim

Victor L. Hou

Rahul Mukhi

Mark E. McDonald